

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

UNITED STATES OF AMERICA

v.

EDELIEL ESANULSANCHAZE RAINEY

NO. 2:24-CR-083-Z

**JOINT MOTION TO CONTINUE TRIAL**

The United States of America (the “government”) and Edieliel Esanulsanchaze Rainey, through counsel, file this joint motion to continue trial as follows:

1. Trial in this case is currently set for April 1, 2025. (Dkt. 52.)
2. The parties have conferred and respectfully ask the Court to continue the trial setting for at least 30 days. The parties have been in plea discussions about a conditional plea to a Superseding Information. The parties are cautiously optimistic that a plea agreement can be reached in this case. However, counsel for Mr. Rainey is in trial this week and would like additional time to thoroughly discuss the proposed plea agreement with her client. Accordingly, the parties ask for at least a 30-day continuance. As noted, the parties are optimistic that a trial will be unnecessary.

Respectfully submitted,

CHAD E. MEACHAM  
ACTING UNITED STATES ATTORNEY

s/ Jeffrey R. Haag  
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CERTIFICATE OF CONFERENCE

I certify that I conferred with Antoinette Harris, attorney for Rainey, and she joins  
this motion.

s/ Jeffrey R. Haag  
JEFFREY R. HAAG  
Assistant United States Attorney